

IN THE COURT OF COMMON PLEAS OF WASHINGTON COUNTY, PENNSYLVANIA  
CIVIL DIVISION

THOMAS ALLEN GIVENS

PLAINTIFF

vs.

WAL-MART STORES, INC.,

DEFENDANT

No. 3939-2022

**FILED**  
JUN 09 2022  
L. H. HOUGH  
PROTHONOTARY

TYPE OF PLEADING:  
COMPLAINT IN CIVIL ACTION

JURY TRIAL DEMANDED

FILED ON BEHALF OF:  
THOMAS GIVENS, PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

ADAM YARUSSI, ESQUIRE  
Pa.ID. No. 315389  
**ADAM YARUSSI & ASSOCIATES, LLC**  
31 N. Main Street, Suite 105  
Washington, PA 15301  
adamyarussilawoffice@gmail.com  
(724) 942-5111

NOTICE TO PLEAD

To: Defendant

You are hereby notified to file a written response to Plaintiff's Complaint within twenty (20) days from service hereof or a default judgment may be entered against you.

  
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF WASHINGTON COUNTY, PENNSYLVANIA  
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NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) DAYS after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you, and a judgement may be entered against you by the Court without further notice for any money claimed in the Complaint or for any claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERRAL SERVICE  
119 South College Street  
Washington, Pennsylvania 15301  
Telephone number: 724-225-6710

SOUTHWESTERN PENNSYLVANIA LEGAL AID SOCIETY  
10 West Cherry Avenue  
Washington, Pennsylvania 15301  
Telephone number: 724-225-6170

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COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, Thomas Givens, by and through his counsel, **ADAM YARUSSI & ASSOCIATES, LLC**, and sets forth his Complaint in Civil Action averring as follows:

PARTIES

1. Plaintiff, Thomas Givens (hereinafter "Plaintiff"), is an adult individual residing at 105 East High Avenue, Elco, PA 15434.
2. Defendant, Walmart, Inc, (hereinafter "Defendant") is a Delaware corporation doing business in the Commonwealth of Pennsylvania with a principal place of business located at 702 S.W. 8<sup>th</sup> Street. Bentonville, AK 72716.
3. Defendant operates a retail store Wal-Mart Supercenter #4501 located at a 134 Daniel Kendall Drive, Washington County, West Brownsville, Pennsylvania 15417.

JURISDICTION & VENUE

4. Venue and jurisdiction are proper in Washington County, Pennsylvania as all the Plaintiff is a resident of Washington County, Pennsylvania and Defendant's business operates within Washington County, Pennsylvania and all facts and occurrences took place at



Wal-Mart Supercenter #4501 located in West Brownsville, Pennsylvania located Washington County, Pennsylvania.

**FACTS**

5. Defendant was charged by the West Brownsville Police Department for Retail Theft 18 Pa.C.S. § 3929 §§ A1 M-1 for allegedly committing a Retail Theft at Wal-Mart Supercenter located at 134 Daniel Kendall Drive, Brownsville, Pennsylvania 15417.
6. Defendant, by and through its Loss Prevention Department's agent, employee, and/or contractor Chad Shontz, claimed Plaintiff was present at Wal-Mart Store, Inc.'s Wal-Mart Supercenter Store #4501 on May 13, 2021, and that Plaintiff was on security footage.
7. According to Loss Prevention Officer Chad Shontz, Mr. Shontz alleged that Plaintiff and two other individuals were observed in the tool section at Wal-Mart Supercenter Store #4501 selected several tools and place them into blue cloth bags.
8. Defendant's employee Chad Shontz indicated that Plaintiff set down the blue cloth bag with tools, and two other individuals exited the store through all points of sale.
9. Wal-Mart, Inc.'s Asset Protection Officer, Chad Shontz, published and/or communicated Plaintiff's name and identified Plaintiff as a criminal offender to the West Brownsville Police Department in order to file criminal charges against Plaintiff. *(See Plaintiff's Attached Exhibit 1)*
10. Plaintiff was working on May 13, 2021 and was not present at Wal-Mart Supercenter Store #4501.
11. Defendant did not see the police report until after the June 17, 2021.

12. Plaintiff requested several times for a copy of the video surveillance video showing Defendant to be present at Wal-Mart Supercenter Store #4501 and even subpoenaed the video but never received a copy proving Plaintiff was present and/or committed the retail theft.
13. Plaintiff by and through Counsel file a Petition for Writ of Habeas Corpus at the Washington County Court of Common Pleas at Docket No. CR-1152-2921, where Defendant's case was dismissed by Senior Judge Katherine Emery with prejudice

**COUNT I**  
**DEFAMATION**  
**THOMAS GIVENS V. WAL-MART STORES, INC.**

14. Plaintiff incorporates by reference paragraphs 1 through 13 as if though were fully set forth herein.
15. A statement is defamatory if it tends to harm the reputation of another so as to lower him in the estimation of the community or deter third persons from associating or dealing with him. 42 Pa.C.S. § 8343.
16. As a direct and proximate result of Defendant's defamation, Plaintiff has suffered economic loss and general distress in an unliquidated amount with income loss to be determined in discovery.
17. Defendant's conduct was knowingly willful, malicious, and outrageous, and warrants imposition of punitive damages.

WHEREFORE, Plaintiff, Thomas Givens, demands compensatory, special, and punitive damages against Defendant, Wal-Mart Stores, Inc., in a sum in excess of \$50,000.00 plus interests, costs, and fees, and any other relief that the court deems just and proper.

**COUNT II**  
**NEGLIGENCE**  
**THOMAS GIVENS V. WAL-MART STORES, INC.**

18. Plaintiff incorporates by reference paragraphs 1 through 17 by reference as if more fully set forth herein.
19. At all times relevant hereto, Plaintiff acted with reasonable care and prudence, and neither contributed to nor caused the damages complained of herein.
20. Defendant, by and through its employees, agent, and/or contractors negligently and carelessly created an Asset Protection Record and communicated with the West Brownsville Police Department defaming Plaintiff calling Defendant by attesting that Defendant committed the crime of retail theft while present as a patron at Wal-Mart Supercenter Store #4501 in West Brownsville, Pennsylvania.
21. Defendant, by and through its employees, agents, and/or contractors, negligently and carelessly failed to investigate and ascertain the proper identity of person who truly committed a retail theft, negligently published the identify and informed the police of the wrong individual and carelessly published and/or orally communicated Plaintiff's name to the West Brownsville, Pennsylvania Police Department in order to institute criminal charges against Plaintiff for a Retail Theft criminal charge.
22. The damages and losses set forth below were the direct and/or proximate result of the negligence, carelessness, and/or recklessness of Defendant, Wal-Mart Stores, Inc., in any and all of the following respects:
  - a. In failing to exercise reasonable care in a reasonable and prudent manner;
  - b. In failing to exercise due care and caution under the circumstances;



- c. Being otherwise negligent and careless reporting facts and at law;
- d. Negligently and falsely reporting Plaintiff's name to the West Brownsville, Pennsylvania Police Department in order to pursue criminal charges against Plaintiff;
- e. Plaintiff's name was held in ill repute in the community;
- f. Plaintiff has lost several job opportunities due to Plaintiff's pending criminal court action which was ultimately dismissed with prejudiced; and
- g. Plaintiff suffered anxiety and emotional distress due to Defendant's negligence, recklessness, and careless investigation of the allegations made against Plaintiff.

23. As a direct and/or proximate result of the above negligence, carelessness, and/or recklessness, Plaintiff has suffered the following injuries and damages including but not limited to:

- a. Insomnia;
- b. Emotional distress; and
- c. shock and mental anguish;

24. As a result of his injuries, Plaintiff has undergone and continues to undergo great pain and suffering and inconvenience.

25. As a result of his injuries, Plaintiff has incurred and may continue to incur income losses and lost job opportunities.

26. As a result of his injuries, Plaintiff may have suffered a diminution of the ability to enjoy life and life's pleasures.

WHEREFORE, Plaintiff, Thomas Allen Givens, demands compensatory, special, and punitive damages against Defendant, Wal-Mart Stores, Inc., in a sum in excess of \$50,000.00 plus interests, costs, and fees, and any other relief that the court deems just and proper.

**COUNT III**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**THOMAS ALLEN GIVENS V. WAL-MART STORES, INC.**

27. Plaintiff, Thomas Allen Givens, incorporates by reference paragraphs 1 through 27 as if fully set forth herein.
28. As a direct and proximate result of the Defendant, Wal-Mart Stores, Inc., Defamation and Negligence set forth above, Plaintiff, Thomas Allen Givens, has experienced and suffered severe emotional distress and extreme mental pain, anguish, and suffering which has manifested itself physically in the form of nightmares, depression, anxiety, and/or loss of concentration.
29. As a result of the Defendant, Wal-Mart's Inc.'s, negligence and/or negligence committed against, Plaintiff, Anthony Ward, was caused by to suffer injuries in the nature of severe and ongoing emotional distress and mental anguish, the physical manifestations of which included sleeplessness, restlessness, anxiety, and discomfort.
30. As a result of the injuries, Plaintiff, Thomas Allen Givens, claims the following damages:
- a. Past and future pain, suffering, mental anguish, discomfort, inconvenience, and distress;
  - b. Past and future embarrassment and humiliation;
  - c. Past and future loss of the ability to enjoy various pleasures of life;
  - d. Past and future loss of earnings and earning capacity;
  - e. All other damages as are permitted by law.



WHEREFORE, Plaintiff, Thomas Allen Givens, demands compensatory, special, and punitive damages against Defendant, Wal-Mart Stores, Inc., in a sum in excess of \$50,000.00 plus interests, costs, and fees, and any other relief that the court deems just and proper.

**COUNT IV**  
**VICARIOUS LIABILITY-AGENCY LIABILITY**  
**THOMAS ALLEN GIVENS V. WAL-MART STORES, INC.**

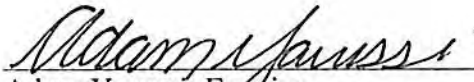
31. Plaintiff incorporates by reference paragraphs 1 through 30 as if fully set forth herein

32. Defendant, Wal-Mart Stores, Inc. is vicariously liable for the negligent acts and/or commissions of Defendant's agents, servants, and/or employees, actual and/or apparent, by virtue of their actual relationship and/or Defendants' omissions, whose negligence is set forth fully throughout this Complaint in Civil Action.

33. As a direct and proximate result of the negligence, carelessness, and recklessness as more specially set forth above, Plaintiff, Thomas Allen Givens, has suffered those injuries and damages outlined about throughout this Complaint in Civil Action.

WHEREFORE, Plaintiff, Thomas Allen Givens, demands compensatory, special, and punitive damages against Defendant, Wal-Mart Stores, Inc., in a sum in excess of \$50,000.00 plus interests, costs, and fees, and any other relief that the court deems just and proper.

Dated: June 7, 2022

  
Adam Yarussi, Esquire  
Pa. Attorney I.D. No. 315389  
**ADAM YARUSSI & ASSOCIATES, LLC**  
31 North Main Street, Suite 105  
Washington, Pennsylvania 15301  
Phone: (724) 942-5111

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VERIFICATION

I, Thomas Givens, hereby verify that the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of my knowledge, information or belief, and further state that I am authorized to make this verification.

This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification

Dated: June 7, 2022

Thomas Givens  
Thomas Givens, Plaintiff

5/18/2021

https://phont25640us.homeoffice.wal-mart.com/apis/apis260/PortalSystem/Api/render.asp?Rec\_ID=IC10103588892&amp;Print=Yes

Case- external theft : 01-21-04501-0000023 (IC10103588892) - Guest( 0 ) 0

**ASSET PROTECTION CASE RECORD**

Case ID 01-21-04501-0000023  
 Status New  
 Location 04501 - WEST  
 BROWNSVILLE, PA  
 Division 01  
 Sub-Division E  
 Region 20  
 Market 235  
 Store Address 134 DANIEL KENDALL DR  
 Store City WEST BROWNSVILLE  
 Store State PA  
 Store Zip Code 15417  
 Country 15417

**Suspect/Offender**

THOMAS GIVENS (Customer)



No Picture Available

**Additional Locations**

No location was set

THOMAS GIVENS  
 10 BROCCO LANE  
 GRINDSTONE  
 PA 15442  
 Phone N/A  
 Cell Phone N/A

ID Number PA -31701327  
 Date of Birth 10/9/1997 (23 now)  
 Employer Name Company name.  
 Vendor Id Vendor Id.

No location was set

Summary Suspect & Persons Event Value/Evidence Interview, Police & Court Case Details All

**Apprehension Information**

\* Event Date 5/13/2021  
 Weekday Thursday  
 Time Apprehended 12:10:00 PM  
 Reporting UserID COSHONT.S04501\_04501\_US  
 Owner Group WAL-MART  
 Owner ID COSHONT.S04501\_04501\_US  
 Assisted By 1 [?] POLICE  
 Assisted By 2 [?]  
 \* Affected Business Walmart  
 \* Incident Type NON-ASSOCIATE THEFT  
 \* Sub-Type CONCEALMENT  
 \* Method of Crime [?] IN SHOPPING BAG  
 \* Location of Crime FRONT ENTRANCE EXIT GM  
 \* Location of Apprehension N/A API

Register Number  
 Operator Number  
 Transaction Number

**Event Value Summary**

MERCHANDISE \$559.41  
 N \$288.80  
 Y \$270.61  
 Total \$559.41

**Apprehension (1)**

Observed By: CHAD SHONTS APASM JENNY

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West Brownsville Police

Jul 07 21 03:10p



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First Observed: 12:10:00 PM

Place Apprehended: NA

Crime Tools: BAGS

\* Handcuffs Used by Wal-Mart Associate: NO

Money on Suspect:

**Suspect/Offender (1)**

No Picture Available

THOMAS GIVENS ID Number PA -31701327  
 10 BROCCO Date of Birth 10/9/1997 (23 now)  
 LANE Employer Name Company name.  
 GRINDSTONE Vendor Id Vendor Id.  
 PA 15442 No location was set  
 Phone N/A  
 Cell Phone N/A

**Parent or Guardian Name (0)**

No record found

**Witness (0)**

No record found

**Persons Acting In Concert (0)**

No record found

**Persons With Knowledge (0)**

No record found

**Event Value (\$559.41 - 25 Items)**

#	* Item Type - REQUIRED FOR ALL ITEMS	* 5-Digit Store / Facility - REQUIRED FIELD(Use Leading Zeros - eg:00001)	UPC	* Desc.	* QtyUnit	Total Price Price (Local)(Local)	* Recovered?
1	MERCHANDISE	04501	88952636583	HT 3P 1/2	1	9.88 9.88	Y
2	MERCHANDISE	04501	7681214538	HT 9P STAR SOCKETS	1	10.84 10.84	Y
3	MERCHANDISE	04501	88952636582	HT 3P 3/8	1	8.88 8.88	Y

[https://phont25640us.homeoffice.wal-mart.com/apis/apis260/PortalSystem/Api/render.asp?Rec\\_ID=IC10103588892&Print=Yes](https://phont25640us.homeoffice.wal-mart.com/apis/apis260/PortalSystem/Api/render.asp?Rec_ID=IC10103588892&Print=Yes)

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4 MERCHANDISE	04501	890732824886	HT 18PC 1	11.94	11.94	Y
			WRENCH SET			
5 MERCHANDISE	04501	7681214531	HT 11PC 1	12.88	12.88	Y
			3/8			
6 MERCHANDISE	04501	82090905821	HT 20P 3/81	17.88	17.88	Y
7 MERCHANDISE	04501	81002239974	HR 1/2 1	16.88	16.88	Y
8 MERCHANDISE	04501	0820909005820	SET	1	15.88	15.88 Y
9 MERCHANDISE	04501	7681214519	HT 3/8 1	7.88	7.88	Y
10 MERCHANDISE	04501	88952636584	HT 3PC 1	6.97	6.97	Y
			UNIV JOINT			
11 MERCHANDISE	04501	81002239065	HR 16P 1	21.97	21.97	Y
			PASS THRU SET			
12 MERCHANDISE	04501	7681212757	HT 1/2 1	10.97	10.97	Y
13 MERCHANDISE	04501	81002239064	HR 3P 1	18.88	18.88	Y
			UNIV RSL SKT SET			
14 MERCHANDISE	04501	81002239817	HR 7P 1	29.88	29.88	Y
			RATCHET WR SAE			
15 MERCHANDISE	04501	081002239059	TOOLS 1	69	69	Y
16 MERCHANDISE	04501	152458548885	PIRATE JACKETS 10	28.88	288.8	N

Total Case Value [?] 559

**Weapon (0)**

No record found

**Evidence****Digital**

\* Evidence Photo No  
Reason for No Evidence Photo  
Evidence Location  
Evidence Custodian  
\* Case Recorded? YES  
VCR or DVR  
DVR?  
CCTV CHAD S  
Operator  
Name

**Tools**

View Tools Used NO

**Other**

Physical Contact NO  
Searched By  
Injuries? NO  
\* Trespass NA  
Prior Record NO  
Record Number  
Incident Number  
Customer NO  
Involved

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West Brownsville Police

Jul 07 21 03:11p



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**Other Tools Used****View Control Breaks**

NO

**Tools Recovered****\* Which departments' merchandise are involved in the recovery?(Check all that apply)**

Other

**Please input****other****Departments****Police (0)**

No record found

**\* Was an ORC form filled out**

No

**\* Was Global Investigations notified**

No

**\* Authority Referred To**

MAG

**Admission Type**

NO ADMISSION GIVEN

**Signed Statement**

NA

**\* Disposition**

CHARGES FILED

**\* Prosecuted?**

Y

**Promissory Note**

No

**Civil Demand  
Account****Rest Override**

0

**Promissory Note  
Amount****Number of  
Payments****Payment Start  
Date****Vehicle Details (0)**

Vehicle makeVehicle typeVehicle colorVehicle plateVehicle stateVehicle ageVehicle detail

**Interview (0)**

No record found

**Court (0)**

No record found

**Record Attachments (0)**

Evidence Number	Evidence Description	File Name	Created By	Created Date	Created Time	Provided to External Agencies
--------------------	-------------------------	--------------	---------------	-----------------	-----------------	----------------------------------

**Approved Date****Approved By User ID****Approved By Name**

CHAD SHONTS - COSHONT.S04501

**Date Created:** 5/18/2021**Closed Date****Closed By**

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West Brownsville Police

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## ONLY LETTERS, NUMBERS, COMMAS, PERIODS AND HYPHENS ARE ALLOWED FOR SPECIAL CHARACTERS

\* Enter time and date of which below described event occurred 12:10:00 PM

**\* Case Details (Created by:  
COSHONT.S04501\_04501\_US - Created date:  
5/18/2021 1:15:27 PM)**

Created by - Created date

COSHONT.S04501\_04501\_US - 5/18/2021 1:15:27 PM

[more...]

I CHAD SHONTS APA WORKING ON 5/13/21 OBSERVED 3 SUBJECTS NOW KNOWN TO ME AS ARRAM NELSON THOMAS GIVENS AND JACOB WOLFE IN THE TOOL SECTION SELECTING SEVERAL TOOLS AND PLACE THEM INTO BLUE CLOTH BAGS. THEY THEN SPLIT UP AS TOMAS AND ARRAM MADE THERE WAY TO THE FRONT DOORS PASSING ALL POINTS OF SALE WHERE APASM JENNY ASKED FOR THE RECEIPT THEY DID NOT HAVE ONE AND SET THE BAG DOWN THOMAS EXITES THE STORE AND ARRAM RE ENTERED THE STORE AND EXITED OUT THE LG EXIT AND JACOB EXITED THE STORE AS WE WERE OUT ON THE SIDE WALK WITH POLICE GETTING A DECRPTION OF THE CAR.WBV POLICE WERE ABLE TO STOP ARRAM IN THE LOT BUT THE OTHERE TOOK OFF IN A CAR.WBV POLICE WILL FILE ALL THE CHARGES.

### Comments and Notes

Created by - Created date

No record found

### Account Information

Account TypeAccount/xref NbrAccount Name

### Rejection Notes

Created by - Created date

No record found

### Tasks (0 Pending)

AssignerAssigneeDue DateTaskNotesStatusCompleted NotesDate CompletedOptions

No Tasks found for this element

### Notifications (0)

No record found

### ALERTS AND MESSAGES

Created by - Created date

No record found

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5/18/2021

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All information contained within this document is considered private and belongs to Wal-Mart Stores, Inc.

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West Brownsville Police

Jul 07 21 03:11p

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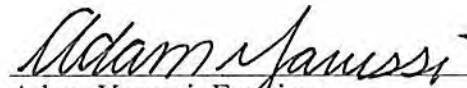
WAL-MART STORES, INC.,

DEFENDANT

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Dated: June 7, 2022



Adam Yarussi, Esquire

Pa. Attorney I.D. No. 315389

**ADAM YARUSSI & ASSOCIATES, LLC**

31 North Main Street, Suite 105

Washington, Pennsylvania 15301

Phone: (724) 942-5111

Email: adamyarussilawoffice@gmail.com